

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)	
COMMISSION'S TRIENNIAL REVIEW ORDER)	CASE NO.
REGARDING LOCAL CIRCUIT SWITCHING)	2003-00347
FOR DS1 ENTERPRISE CUSTOMERS)	

PETITION FOR CONFIDENTIAL TREATMENT

Kentucky ALLTEL, Inc. ("Kentucky ALLTEL") moves the Public Service Commission of Kentucky ("Commission") pursuant to K.R.S. §61.878(1)(c)(1) and 807 KAR 5:001, Section 7 to accord confidential treatment to Exhibits A, B, and C ("Exhibits") to Kentucky ALLTEL's Responses to Commission Staff's Data Requests and in support thereof states the following:

1. On October 21, 2003 in this proceeding, the Commission Staff issued Data Requests with respect to information including, but not limited to, the high-capacity (DS1 or greater) circuits that are provided on a retail basis to end users and on a wholesale basis to competitive local exchange carriers ("CLECs"), the high-capacity (DS1 or greater) unbundled network element ("UNE") loops leased by CLECs, and the aggregated annual revenues generated from all customer accounts by wire center.

2. In order to adequately answer Commission Staff's Data Requests, Kentucky ALLTEL prepared the Exhibits, redacted copies of which are being filed with Kentucky ALLTEL's Responses to the Data Requests and an unredacted copy of which is being filed under seal as Exhibit 1 to this Petition.

3. Kentucky ALLTEL developed the Exhibits at its own expense and devoted substantial resources to compiling the underlying data making up the Exhibits. The inputs and outputs are treated as highly confidential by Kentucky ALLTEL and its affiliates. The redacted portions of the Exhibits contain information that has not been released publicly and is disclosed internally within Kentucky ALLTEL on a need-to-know basis only and to the Commission only when required and only pursuant to a confidentiality agreement or enforceable order according to the information confidential treatment. Kentucky ALLTEL employs all reasonable measures to protect the confidentiality of the proprietary information in the Exhibits and to guard against inadvertent, unauthorized disclosure.

4. K.R.S. §61.878(1)(c)(1) provides in pertinent part:

The following public records are excluded from the application of ...[the Open Records Act] and shall be subject to inspection only upon order of a court of competent jurisdiction ...

(c)1. ...records confidentially disclosed to an agency or required by an agency to be disclosed to it, generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records.

5. Public disclosure of the redacted portions of Kentucky ALLTEL's Exhibits would provide other entities an unfair competitive advantage by affording them access to Kentucky ALLTEL's revenue information and customer information (in particular the proprietary information of Kentucky ALLTEL's wholesale customers). Such revenue and customer information contained in the Exhibits is generally considered confidential and proprietary in the telecommunications industry. Portions of the redacted information contain competitive carrier information which if published would divulge highly sensitive competitive information which

could unduly prejudice the carriers so identified. Further, Kentucky ALLTEL is not entitled to publish such competitively sensitive information on behalf of the competitive carriers.

6. The confidential portions of the Exhibits also protected from disclosure pursuant to K.R.S. §61.878(1)(c)(2)(c) as confidential and proprietary records disclosed to the Commission in conjunction with the regulation of a commercial enterprise.

7. Filed with this Petition is one copy of the Exhibits that identifies by highlighting those portions that are confidential. Also filed are ten copies of the Exhibits with the confidential information redacted.

8. Filed also with this Petition is a diskette containing the unredacted Exhibits. Due to the highly confidential nature of the Exhibits as set forth herein, this diskette should not be duplicated under any circumstance and should be viewed only from the original diskette provided by Kentucky ALLTEL.

WHEREFORE, Kentucky ALLTEL respectfully requests that the Exhibits be accorded confidential treatment and be placed in the confidential files of the Commission, that viewing of the diskette containing the unredacted Exhibits be restricted to only Commission and Staff involved in this proceeding, that no party to this proceeding including Commission Staff be permitted to duplicate the diskette containing the unredacted Exhibits, and that Kentucky ALLTEL be accorded all other relief to which it may be entitled.

Dated: November 21, 2003.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Petition for Confidential Treatment and redacted Exhibits were served on the following by either electronic service or by first class mail, postage prepaid:

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This 21st day of November, 2003.

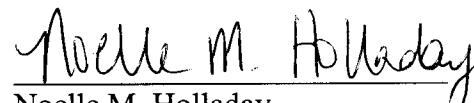

Noelle M. Holladay

Exhibit "A"
Response to Data Request 1.a.(i), (ii).

Exhibit A

EXCHANGE	RETAIL	WHOLESALE	TOTAL
			44
			4
			220
			685
			14
			84
			34
			4
			240
			2
			1
			11
			13
			19
			8
			4
			20
			5
			44
			91
			359
			11
			1
			57
			62
			30
			4
			65
			5
			1
			2
			7
			15
			1
			17
			13
			1113
			8
			21
			3
			2
			1
			2
			18
			8
			99
			4

Exhibit A

				TOTAL
				9
				2
				246
				17
				60
				93
				52
				52
				312
				2
				42
				46
				74
				10
				11
				35
				3
				112
				93
				1
				2181
				299
				204
				207
				4463
				222
				413
				274
				88
				115
				7
				1112
				3
				1
				5
				54
				1
				37
				148
				11
				4
				98
				465
				10
				4
				31
				4
				400
				2
				8

Exhibit A

			TOTAL
			15
			2
			51
			1
			6
			20
			1
			2
			24
			99
			8
			1
			6
			52
			2
			9
			32
			28
			574
			10
			3
			22
			16
			10
			6
			10
			22
			32
			4
			3
			114
			234
			10
			87
			8
			1
			39
			5
TOTAL	7901	9287	17188

Exhibit “B”
Response to Data Request 1.b.

Exhibit B

CENTRAL OFFICE	CLLI	Exchange	CLEC	DS3	DS1
				0	0
				0	0
				0	0
				0	0
				3	12
				3	12
				3	12
				0	0
				3	12
				0	0
				0	0
				8	84
				3	12
				11	96
				3	12
				3	12
				36	0
				24	84
				3	12
				24	28
				4	168
				9	252
				100	544
				3	12
				4	168
				7	180
				8	84
				3	12
				4	168
				15	264
				3	12
				3	12
				0	0
				0	0
				0	0
				0	0
				3	12
				3	12
				0	0
				0	0
Grand Total				148	1144

Exhibit "C"
Response to Data Request 3.a.

Exhibit C

Kentucky ALLTEL, Inc.

[illegible]

Kentucky ALLTEL, Inc.[illegible]

Kentucky ALLTEL, Inc.[illegible]